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VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square New York, New York 10007

Re: *United States v. Alon Alexander et al.*, Docket No. 24-CR-00676 (VEC)

Dear Judge Caproni:

The Court has set a status conference for this Wednesday, January 29. I write on behalf of Alon, Tal, and Oren Alexander to request that Your Honor adjourn that conference until February 12 to allow them sufficient time to make arrangements to retain trial counsel of choice. Tal and Oren Alexander join in this request. The government takes no position (does not object) to this request. The Alexanders agree that the time required for the requested adjournment is excludable time for purposes of the speedy trial clock.

The Alexanders were arrested in Florida (SDFL) on December 11 and made initial appearances there. They remained in Florida for detention and removal proceedings until January 16, when United States Marshals custodially transported them to Oklahoma, then to Pennsylvania, and finally to MDC Brooklyn, where they arrived on January 23. For all but one day of that journey, they were incommunicado, spending four days in solitary confinement. Along the way, Alon Alexander was separated from his legal papers, which have yet to be returned to him.

Meanwhile, Your Honor kindly allowed Florida counsel (Srebnick and Klugh) to appear pro hac vice for the January 15 detention hearing on behalf of Alon and Oren, respectively.

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The government has indicated that the trial will take at least three weeks, and that the discovery is voluminous. It is unknown whether the government plans to seek a superseding indictment.

The Alexanders have contacted several New York-based attorneys and one out-of-state attorney to meet with the Alexanders at MDC Brooklyn this week to discuss appearing as trial counsel. It will take the Alexanders a couple of weeks to select and make financial arrangements to retain their respective counsel of choice.

In the spirit of judicial economy and attorney efficiency, the Alexanders propose that the January 29 Status conference be adjourned until February 12, at which time they would appear with their trial counsel for a consolidated hearing under Rule 5 (initial appearance) and Rule 10 (arraignment), as well as address the government's pending motion for protective order (filed on January 24).

Respectfully submitted,

/s/ Howard Srebnick
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